

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

V.

NO. 15-CR-4268-JB

**EDWARD TROUP (3),
JERRY MONTOYA (14),
DANIEL SANCHEZ (18),
ANTHONY RAY BACA (21),
ANDREW GALLEGOS (25), and
CARLOS HERRERA (27),**

Defendants.

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLY TO
GOVERNMENT’S RESPONSE TO JOINT MOTION FOR DISCLOSURE AND
PRODUCTION OF CONFIDENTIAL INFORMANT (DOC. 698)**

COME NOW, Defendants Edward Troup, Jerry Montoya, Daniel Sanchez, Anthony Ray Baca, Andrew Gallegos, and Carlos Herrera, by and through their attorneys, and submit this Unopposed Motion for Extension of Time to File Reply to Government's Response to Joint Motion for Disclosure and Production of Confidential Informant [Doc. 698]. As grounds, the Defendants respectfully submit the following:

1. On September 22, 2016, Defendant Rudy Perez filed a Joint Motion for Disclosure and Production of Confidential Informant. [Doc. 698]
2. The government filed its Response on October 17, 2016 [Doc. 741], after being granted an extension. [Docs. 727]

3. The government and Defendant Perez reached an agreement and this Court signed a Protective Order which permitted the government to disclose the identity of the confidential informant to Mr. Perez' defense team only. [Doc. 748]

4. The reply of remaining Defendants who joined the motion is due on or before October 31, 2016, pursuant to D.N.MLR-Cr. 47.8(a). These Defendants seek additional time to complete their reply to the government's response.

5. Undersigned counsel Cori Harbour-Valdez spoke with Assistant United States Attorneys Randy Castellano and Matthew Beck on October 25, 2016. They are not opposed to the instant motion nor the relief requested herein.

6. Undersigned counsel Harbour-Valdez sought the position of the remaining Defendants. Counsel for Eugene Martinez and Robert Martinez indicated they took no position on the motion. All remaining counsel indicated they are not opposed the instant motion nor the relief requested herein.

WHEREFORE, PREMISES CONSIDERED, Defendants Edward Troup, Jerry Montoya, Daniel Sanchez, Anthony Ray Baca, Andrew Gallegos, and Carlos Herrera respectfully request that this Court grant them an extension of time in which to file their Reply to Government's Response to Joint Motion for Disclosure and Production of Confidential Informant [Doc. 698] until November 7, 2016.

DATED: October 26, 2016.

Respectfully submitted,

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Counsel for Daniel Sanchez (18)

/s/ Marc Lowry
Theresa M. Duncan
Marc Lowry
Counsel for Anthony Ray Baca (21)

/s/ Carey Bhalla
Michael Davis
Carey Bhalla
Counsel for Carlos Herrera (25)

/s/ Donavon A. Roberts
Donavon A. Roberts
Counsel for Andrew Gallegos (27)

CERTIFICATE OF SERVICE

I hereby certify that on October 26, 2016, I caused the instant motion to be filed with the Clerk of the Court using the CM/ECF system that will serve all other parties entitled to service and notice.

s/Cori A. Harbour-Valdez
Cori A. Harbour-Valdez